



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
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NEW YORK, NY 10007-1866

SEP 28 2007

Ms. Rebecca Tadesse, Chief  
Materials Decommission Branch  
Division of Waste Management and  
Environmental Protection  
United States Nuclear Regulatory Commission  
M.S. 8F5  
11545 Rockville Pike  
Rockville, MD 20852

479937



Subject: Shieldalloy Metallurgical Corporation's  
Decommissioning Plan for Newfield, NJ Site

Dear Ms. Tadesse:

This letter is written to inform you that the United States Environmental Protection Agency (EPA) has completed its review of the October 2006 Decommissioning Plan (DP) for the Shieldalloy Metallurgical Corporation (SMC) facility located in Newfield, New Jersey.

EPA's comments on the DP are enclosed. Based on EPA's review, we find that the sampling program performed by Shieldalloy Metallurgical Corporation (SMC) in support of the DP is severely deficient and failed to characterize the extent of radiological waste as well as potential mixed wastes located throughout the site. Areas of significant concern requiring additional characterization include Storage Yard wastes, surface and subsurface soils both on and off of the plant property, underground discharge lines, surface water, sediment, and groundwater. Any decision regarding the remediation of radioactive material at the site can only be made based on a complete characterization of the nature and extent of the radiological contamination found at the site. Therefore, SMC must collect and analyze significant additional data, as outlined in the attached comments, prior to a final decision on the decommissioning of this facility.

Further, since the current risk assessment is based on incomplete site characterization of the radiological contamination, SMC must conduct an appropriate risk assessment after the site characterization is complete. In addition, the risk assessment must address significant exposure pathways which

inhalation of radon decay products in indoor air due to the use of site groundwater, and ingestion of site groundwater and homegrown produce. Additional comments on SMC's risk assessment are attached.

Based on our review of the DP, EPA is concerned that the Long Term Control (LTC) option proposed by SMC in the DP, if implemented, may not be protective of human health and the environment and may not be the best option for addressing the radioactive waste materials found on the facility. Based on the limited data presented in the DP, EPA cannot support the LTC option. EPA believes that the method of decommissioning of the SMC facility may have a significant impact on the Superfund portion of the site and the surrounding communities.

In your March 6, 2007 letter to Mr. Walter Mugdan, of EPA, you indicated that you would like to meet with the EPA to discuss our assessment of the DP. This letter was forwarded to me, as the Superfund Division is the lead division for review of the DP. My technical staff would be happy to meet with your technical staff to go over the enclosed comments upon your request.

If you should have any questions regarding the above, please contact me at (212) 637-4420, or have your staff contact Mr. Trevor Anderson, of my staff, at (212) 637-4425.

Sincerely,



Carole Petersen, Chief  
New Jersey Remediation Branch

Enclosure

cc: Donna Gaffigan, NJDEP